

## Karen Parsons

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**From:** Simon Davis  
**Sent:** 25 March 2019 10:35  
**To:** Karen Parsons  
**Subject:** FW: Clays Farm Y/62/18/OUT

EoT 07/06/19 Thanks

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |  
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Internal: 37874 | External: +44 (0) 1903 737874 | E-mail: [simon.davis@arun.gov.uk](mailto:simon.davis@arun.gov.uk)  
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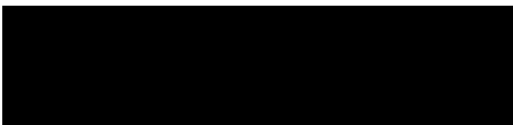
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**From:** Paul White [REDACTED]  
**Sent:** 22 March 2019 16:00  
**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Cc:** Kerry Simmons [REDACTED]  
**Subject:** RE: Clays Farm Y/62/18/OUT

Dear Simon,  
Excellent news, thank you and Neil and naturally the eot until the 7 June is agreed. I'll ensure the legal opinion is provided in a way suitable for public viewing.  
Kind regards,

**Paul White BA (Hons) DipTP MRTPI**  
Director of Planning  
[Paul@genesistp.co.uk](mailto:Paul@genesistp.co.uk)

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**From:** Simon Davis [mailto:Simon.Davis@arun.gov.uk]  
**Sent:** 22 March 2019 15:53  
**To:** Paul White  
**Cc:** Kerry Simmons; 'Edward Rees'  
**Subject:** RE: Clays Farm Y/62/18/OUT

Dear Paul,

Having just spoken again with Neil, we will be prepared to recommend this for approval at Committee. We will make an 'on balance' case having regard to Housing Delivery Test, the AMR and delivery rates as affected by recent Pagham applications.

However, the agenda for the April Committee closes today so it will have to go to our 5<sup>th</sup> June Meeting (there is no Ctte in May due to elections). I will therefore need an Extension of Time until at least the 7<sup>th</sup> June (we may need longer if the 106 process takes time). I will then need to get on with an instruction to Legal to commence the S.106.

A legal opinion would be helpful for me in terms of the recommendation/arguments. However, note that this must be provided so it is available for public viewing if it is to be considered within my report.

Kind Regards

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Simon J. Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, [Arun District Council](#) |  
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**From:** Paul White  
**Sent:** 22 March 2019 15:08  
**To:** Simon Davis <Simon.Davis@arun.gov.uk>  
**Cc:**  
Easton <David.Easton@arun.gov.uk>  
**Subject:** RE: Clays Farm Y/62/18/OUT

Dear Simon,

We have of course just spoken and to confirm we wish to formally respond to your email with legal opinion. The clerk tells me that the earliest we can have an opinion based on our briefing note will be towards the end of April. Therefore please can we agree an eot until April 30th. We understand that if as a result there is a changed recommendation, it will have to go to committee and the earliest wouldn't be until June.

Thanks again, and please let me know the eot is agreed.

Kind regards

**Paul White BA (Hons) DipTP MRTPI**  
Director of Planning  
[Paul@genesistp.co.uk](mailto:Paul@genesistp.co.uk)

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**From:** Simon Davis [mailto:Simon.Davis@arun.gov.uk]

**Sent:** 22 March 2019 14:45

**To:** Paul White

**Cc:** Kerry Simmons; 'Edward Rees' [REDACTED]

**Subject:** RE: Clays Farm Y/62/18/OUT

Dear Paul,

Thanks for your email. I was aware of the decision to allow the JR.

I spoke with Neil Crowther after your email of 15 March and we both agreed that we would still be refusing the application. However, it may be that by the time of an appeal, that the situation has changed and we have to respond accordingly.

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |  
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**From:** Paul White <Paul@genesistp.co.uk>

**Sent:** 21 March 2019 10:32

**To:** Simon Davis <Simon.Davis@arun.gov.uk>

**Cc:** Kerry Simmons <[REDACTED]>

Easton <David.Easton@arun.gov.uk>

**Subject:** RE: Clays Farm Y/62/18/OUT

Hi Simon,

I understand that leave was granted for JR on the 19 March for the 400 units in application P/140/16 at Pagham so that will proceed to High Court now. This will inevitably impact on the anticipated delivery of housing at site 66 so that worsens the land supply position. I've phoned David Easton for a heads up on it and no doubt he can give you more info should you need it.

Kind regards

**Paul White BA (Hons) DipTP MRTPI**

Director of Planning

[Paul@genesistp.co.uk](mailto:Paul@genesistp.co.uk)

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**From:** Paul White  
**Sent:** 15 March 2019 12:41  
**To:** 'Simon Davis'  
**Cc:** Kerry Simmons; 'Edward Rees'  
**Subject:** RE: Clays Farm Y/62/18/OUT

Hi Simon,

Timely email and thank you for letting me know. I say timely because I attach a 5 year land supply assessment recently prepared by the applicant's agent Intelligent Land, showing what they consider the current position to be. The supply table is actually over optimistic on some of the sites such as site 66 which strictly speaking should have a zero contribution based on the housing delivery test as it is subject of an appeal against a high court judgement to refuse leave for JR (David Easton advised us of this). Instead, the table includes 65 dwellings for the 2017-22 scenario, 108 in the 2018-23 and 151 in the 2019-24 scenario. The total supply figures are reproduced in the separate summary position table. This shows a land supply shortfall of between 1.69-1.89 years for the different scenarios. ADC's own assessment is only slightly better at 1.78-2.08 year supply.

We have brought the figures to your attention now because we think it will assist our case at appeal should you proceed with your proposed refusal. Naturally to allow review of your draft report and the land supply assessment attachments the eta until 29 March is agreed.

Please note the assessment has been provided to you, your team leader and head of planning on a confidential basis and we would request that it is not disclosed to any other third party outside ADC or placed on your website.

Thanks in advance and I look forward to receiving your further response.  
Kind regards

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**From:** Simon Davis [mailto:Simon.Davis@arun.gov.uk]  
**Sent:** 14 March 2019 16:59  
**To:** Paul White  
**Cc:** Kerry Simmons  
**Subject:** RE: Clays Farm Y/62/18/OUT

Dear Paul,

I have just finished writing this report up. As you will expect, it is recommending refusal.

I now need to have it reviewed by a Team Leader and also separately by the Group Head of Planning. This process may take a week or two and I would therefore like to request an extension of time until the 29<sup>th</sup> March 2019. Please let me know whether you can agree to this.

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |

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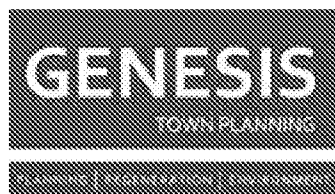
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**From:** Paul White [REDACTED]  
**Sent:** 09 January 2019 09:39  
**To:** Simon Davis <[Simon.Davis@arun.gov.uk](mailto:Simon.Davis@arun.gov.uk)>  
**Cc:** Kerry Simmons [REDACTED]  
**Subject:** RE: Clays Farm

Thanks Simon,  
Hopefully no big deal as what with the other sites coming forward all around ours, the boundary from the old local plan doesn't really represent what the built up area now comprises and can be viewed as a time expired boundary. As mentioned I'll report back following next Mondays Yapton Parish council meeting.  
Kind regards

**Paul White BA (Hons) DipTP MRTPI**  
Director of Planning  
[Paul@genesistp.co.uk](mailto:Paul@genesistp.co.uk)

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**From:** Simon Davis [<mailto:Simon.Davis@arun.gov.uk>]  
**Sent:** 08 January 2019 17:30  
**To:** Paul White  
**Cc:** Kerry Simmons  
**Subject:** Clays Farm

Dear Paul,

Further to our conversation earlier regarding the HELAA and our Housing Land Supply, I have sought clarification from our Policy team. It is accepted that the HLS within the LP includes 530 houses from deliverable HELAA sites and it is accepted that your site was considered to be deliverable within the HELAA. However, please note that paragraph 12.1.16 of the LP makes it clear that deliverable HELAA sites are only those that are within the built up area boundary:

*“12.1.6 The Plan period runs from 2011 to 2031. The housing trajectory (Picture 12.1) covering the Plan period is included as an appendix to the Plan, and is set out in further detail within the Housing Implementation Strategy. The housing supply for the Plan period comprises of:*

*Net completions – dwellings already completed which provide a net addition to the housing stock;  
Net commitments – dwellings that will provide a net addition to the housing stock on sites that already have planning permission;  
Neighbourhood Plan Allocations – sites included as allocations in made  
Neighbourhood Plans which are yet to be developed;  
‘Deliverable’ HELAA sites – sites located within the Built Up Area Boundaries which are identified as being available and deliverable through the Housing and  
Economic Land Availability Assessment;  
Windfall allowance – reflecting the contribution to be made by ‘windfall’ sites to the housing supply, based on monitoring data;”*

Kind Regards

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